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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

UNITED STATES OF AMERICA

Plaintiff,

vs.

CITY OF PORTLAND,

Defendant.

Case No. 3:12-cv-02265-SI

DECLARATION OF JUAN C. CHAVEZ

I, Juan C. Chavez, submit the following declaration:

I am the counsel of record for the Mental Health Alliance, and I make this declaration in support of the Mental Health Alliance's July 2022 Status Hearing Briefing for the purpose of identifying exhibits. My statements are true to the best of my own knowledge, except as to those matters which are therein alleged on information and belief, and as to those matters, I believe them to be true.

DECLARATION OF JUAN C. CHAVEZ

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1. **Exhibit 1** is a letter from the Multnomah County Commissioners to the Mental Health Alliance, dated July 6, 2022.

I hereby declare that above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

DATED: July 25, 2022.

/s/ Juan C. Chavez
Juan C. Chavez, OSB #136428
Of Attorneys for *Amicus Curiae*
Mental Health Alliance



Board of County Commissioners

Mental Health Alliance
PO Box 3641
Portland, OR 97208

July 6, 2022

To the Mental Health Alliance:

As the Local Mental Health Authority, Multnomah County has a keen interest in reducing the interactions between local law enforcement and those suffering from behavioral health issues. The evidence produced by your organization indicates a troubling increase since 2017, along with an intensification in the use of force. That's why we appreciate your inquiry as to what additional investments could reduce such interactions.

Earlier this month, Multnomah County passed a budget that devotes \$15.5 million to the intersectionality between homelessness and behavioral health. Our budget funds the opening of our downtown Behavioral Health Resource Center this fall, which will offer a drop-in day center, behavioral health shelter beds, bridge housing and multiple peer-led services. It pilots a program that provides permanent supportive housing for up to 50 people experiencing homelessness who have been identified as frequent users of the homeless services, emergency healthcare and criminal justice systems. It increases funding for a program that connects people experiencing homelessness with substance use disorders to treatment, detox and recovery services, with a focus on culturally specific care coordination for African American, Latinx and LGBTQIA2S+ clients. It improves upon our peer support network, and maintains our In-Reach support program that assists our Old Town service partners.

Yet additional and improved services are clearly needed. We believe three key areas of investment would assist in reducing interactions between law enforcement and those experiencing a behavioral health crisis, which we would prioritize should additional federal or state funds become available to assist with implementation of the settlement:

Board of County Commissioners



First, ***increased medical sobering services***. While the Behavioral Health Emergency Coordination Network (BHECN) is working to address long term sobering service needs, there is an immediate need for medical sobering services, which can help those on methamphetamine detox safely for up to 5 to 7 days in a medical setting.

Second, ***additional investments in crisis response and peer support services***. Programs providing mobile crisis response and peer support have been demonstrated to effectively support people experiencing behavioral health challenges and reduce the need for a police presence.

Lastly, ***resources for the development of additional Behavioral Health Resource Centers, paired with transitional housing***. Multnomah County expects to open the downtown Behavioral Health Resource Center this coming fall. The development of an additional facility in east Portland, which would also include a drop-in day center, shelter beds, peer-led services and transitional housing, would augment the one serving downtown Portland and provide those living in east Portland with accessible services.

While we are ramping up supportive housing, many people leaving medical sobering or recovering from a behavioral health episode and who are unhoused lack a safe, sheltered place to live. Returning to homelessness can trigger behavioral health issues, and land people back at square one. Added transitional housing would enable people to continue their recovery and additional time to secure more permanent housing and support.

We understand that your inquiry comes as the Alliance weighs in on the conditions and terms of the settlement in *US DOJ v City of Portland*. We hope that this information is helpful, and appreciate your consideration, as well as your advocacy for those in our community suffering from behavioral health issues.

Respectfully,

Board of County Commissioners



Handwritten signature of Deborah Kafoury in black ink.

Deborah Kafoury, Chair

Handwritten signature of Sharon Meieran in black ink.

Sharon Meieran, District 1

Handwritten signature of Susheela Jayapal in black ink.

Susheela Jayapal, District 2

Handwritten signature of Jessica Vega Pederson in black ink.

Jessica Vega Pederson, District 3

Handwritten signature of Lori Stegmann in blue ink.

Lori Stegmann, District 4